



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

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IN REPLY REFER TO

5090
Code 09TB/JC

02 FEB 2001

Mr. Steve Scharf
New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Eastern Remedial Action
Room 242
50 Wolf Road
Albany, New York 12233-7010

Re: Draft PRAP Northrop Grumman-Bethpage Facility;
Naval Weapons Industrial Reserve Plant (NWIRP) Bethpage
Grumman-Steel Los Plant 2

Dear Steve:

This letter is being submitted in order to forward additional comments regarding the New York State Department of Environmental Conservation's (NYSDEC's) Draft PRAP for Operable Unit 2 - Groundwater. The enclosed comments were prepared on behalf of the Navy by Tetra Tech NUS (TtNUS) and are to be considered as additional comments to those previously forwarded to the NYSDEC in a letter dated 4 August 2000.

In addition, the Navy has also reviewed comments prepared on behalf of the Northrop Grumman Corporation by ARCADIS Geraghty & Miller and would like to offer its concurrence with regards to the comments on the Draft PRAP as well as to the responses to comments received from the various water districts.

If you have any questions or would like to discuss this issue further, please give me a call at (610) 595-0567, extension 163.

Sincerely,

JAMES L. COLTER
Remedial Project Manager
by Direction of the
Commanding Officer

Enclosure: (1) Comments on NYSDEC's PRAP for OU2 - Groundwater

Copy to:
NYSDEC Region I, Ray Cowen
NYSDOH, Bill Gilday
NAVAIR, Joe Kaminski
J.A. Jones, Al Taormina
NGC, Larry Leskovian/John Cofman
AGM, Carlo San Giovanni/Mike Wolfert

**Comments on NYSDEC's
Operable Unit 2 - Groundwater Proposed Remedial Action Plan
Dated November 3, 2000**

The following comments are intended to address only potentially significant issues relevant to the Navy regarding the PRAP and forthcoming ROD for the site.

1. Page 1. The text should be clarified to indicate that there are no current risks to public health and that the threats are potential future risks, and only result in the event that no further action is taken.
2. Page 7, second column. The PRAP/ROD should also state that the Navy's OU 1 ROD addresses shallow groundwater at Navy IR Site 1 - Drum Marshalling Area and the installation of well head treatment on a BWD well partially addresses offsite groundwater contamination.
3. Page 11, first column, second paragraph. While TCE was detected at a high concentration in one onsite monitoring well (HN-24), recent testing has found that only a minimal contamination of TCE remains in this area. This finding is significant and should be stated in the report. Also, the short time required for this area to flush out suggests that the area was not a major source of groundwater contamination as some of the figures suggest.
4. Page 14, second column, fourth bullet. Remediation of soil contamination is addressed in the OU 1 RODs and should not be referenced directly in this PRAP/ROD.
5. Page 17, first column and several other places. The statement that "Activated carbon adsorption is a process that effectively removes low levels of VOCs contaminants from water" is not accurate. Some of the VOCs found in the site groundwater are poorly adsorbed onto granular activated carbon, e.g. see the OU 2 Groundwater Feasibility Study for the site. Low-level contaminant breakthrough can occur and break through can be sporadic.
6. Page 22, second paragraph. The short-term impacts associated with GM38 area remedy, should include the transport of hazardous chemicals (spent activated carbon) through the neighborhood. Also, the remedy should indicate that the state will support acquisition of property in this area necessary to construct and operate an extraction and treatment system.

Internal Cys to:

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